

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

CITY OF SOUTH BEND,)	
)	
Petitioner,)	
)	
v.)	Cause No. 3:12-CV-475-JVB-CAN
)	
SOUTH BEND COMMON COUNCIL,)	
TIM CORBETT, DAVE WELLS, STEVE)	
RICHMOND, BRIAN YOUNG, AND)	
SANDY YOUNG,)	
)	
Respondents.)	

STIPULATION OF UNDISPUTED FACTS FOR TRIAL

The Parties, the City of South Bend, the South Bend Common Council, and Tim Corbett, Dave Wells, Steve Richmond, Brian Young, and Sandy Young, by counsel, stipulated to the following undisputed facts during trial held on August 12 and August 13, 2014:

1. Darrell Gunn and Chuck Hurley are former chiefs of police for the South Bend Police Department.
2. While Gunn and Hurley were the chiefs of police, there was no policy, written or otherwise, regarding the recording of private lines of police officers.
3. Gunn and Hurley would never have recorded a private line of a police officer without advising the police officer that his line was being recorded.
4. Gunn was Chief of Police from January of 1996 to June of 1999.
5. Hurley was Chief of Police from April of 1984 to October of 1988 and from March of 2011 to April of 2012.

Respectfully submitted,

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